

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 4:24-CV-10017-JEM

AKARI JOHNSON and  
HAZEL THOMPSON,

Plaintiffs,

v.

MMI 82, LLC, and  
THE ENTHUSIAST LLC,

Defendants.

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**DEFENDANTS' MOTION TO EXTEND THE DISCOVERY DEADLINE**

Defendants, MMI 82, LLC and THE ENTHUSIAST LLC (“Defendants”), pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, and all other applicable rules, orders, and case law, hereby file this *Motion to Extend the Discovery Deadline* (“Motion”), and as grounds state:

1. On May 31, 2024, the Court entered an Order Setting Civil Trial Date and Pretrial Schedule, Requiring Mediation, and Referring Certain Motions to Magistrate Judge (“Order”) [E.C.F. 13]
2. Per the Order, the deadline for discovery completion is March 20, 2025.
3. On March 3, 2025, Plaintiffs responded to Defendant’s discovery requests, including document production and interrogatories. In connection with the document production, Plaintiffs produced signed declarations of Aileen Gonzalez and Daniella Rodriguez. The Defendants require some additional time to subpoena and set both witnesses for deposition.
4. Therefore, the undersigned requests that the Court allow the parties to conduct discovery for an additional sixty (60) days, through and including May 17, 2025.

5. No parties would suffer any prejudice or inconvenience as a result of the relief requested in this Motion.

6. The requested relief is not for any improper purpose. Rather, the relief sought will provide counsel with sufficient opportunity to prepare the case and make an appropriate presentation to the Court and factfinder.

7. The undersigned certifies that the requested extension will not affect the trial date, (currently set for July 28, 2025), or any other deadline set forth in the Scheduling Order.

**WHEREFORE**, Defendants, MMI 82, LLC and THE ENTHUSIAST LLC respectfully request this Court enter an Order granting this Motion, as reflected above, and granting any further relief this Court deems just and proper.

**CERTIFICATION OF CONFERRAL UNDER LOCAL RULE 7.1 (A)(3)**

Pursuant to Local Rule 7.1(a)(3), I hereby certify that on March 13, 2025, counsel for Defendants conferred with Plaintiffs' counsel regarding the relief sought in this Motion, and unfortunately counsel for the Plaintiffs did not agree to the relief sought herein.

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document has been furnished to the following by e-mail or e-service on March 17, 2025:

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Respectfully submitted,

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